

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**FATHER CHRIS COLLINS as Next
Friend of J.Y.C.C., et al.,**

Plaintiffs,

VS.

THE DOE RUN RESOURCES CORPORATION, et al.,

Defendants.

Case No. 4:15-CV-01704-RWS
(consolidated cases)

**DEFENDANTS' MOTION FOR LEAVE TO FILE A BRIEF
IN EXCESS OF THE PAGE LIMIT**

COME NOW Defendants and hereby move under E.D.Mo. L.R. 7-4.01(D) for leave to file a brief that exceeds fifteen pages in length. The over length brief Defendants seek to file is their joint Reply in support of their Motion to Substitute Plaintiffs' Parents or Legal Guardians as Next Friends ("Motion to Substitute"). As grounds for this motion, Defendants state as follows:

1. Defendants jointly moved pursuant to Fed.R.Civ.P. 15 and 17 for the Court to substitute Plaintiffs' parents (or legal guardians) as the proper parties to bring the claims of the nearly 1,100 minors now before the Court.

2. Defendants opening brief drew upon Missouri and federal law that substantiate the relief Defendant seek through the Motion to Substitute. Plaintiffs' response brought to bear additional considerations arising under Peruvian law. In order to address the Plaintiffs' response under both the standards set out in Defendants' original motion and to address the additional standards Plaintiffs response discusses, Defendants' reply brief is twenty-two pages in length.

3. The level of information and analysis contained in Defendants' Reply is all necessary to address Plaintiffs' response and for the Court to rule upon Defendants' request that

Fr. Collins be replaced by the Plaintiffs' parents or legal guardians of all approximately 1,100 minor plaintiffs.

WHEREFORE, Defendants respectfully request leave to file a 22-page Reply brief in Support of their Motion to Substitute Plaintiffs' Parents or Legal Guardians as Next Friends.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 7th day of March, 2017, a true and correct copy of the foregoing was filed with the Clerk of the Court through the Court's CM/ECF system, which will effect service on all counsel of record by sending a Notice of Electronic Filing.

/s/ Edward L. Dowd, Jr.